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ORIGINAL

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA

NATHAN CHARLES GRIGGS ) DOCKET 1:CV-00-2219  
Plaintiff )  
v. )  
JOHN D. PAYNE, et al. )  
Defendants )

FILED  
HARRISBURG  
APR 30 2001  
Per MARY E. D'ANDREA, CLERK  
DEPUTY CLERK

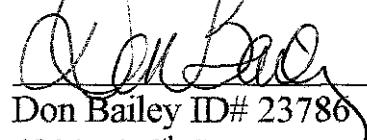
MOTION FOR AN ENLARGEMENT OF TIME

- 1.) On or about December 20, 2001, plaintiff filed this complaint Pro Se and In Forma Pauperis.
- 2.) On April 16 2001, defendants attorney, Frank Lavery filed a Motion to Dismiss Pursuant to Rule 12 (b) (6) of the Federal Rules of Civil Procedure in the above referenced matter.
- 3.) On or about April 20, 2001, plaintiff sent a copy of his complaint and documents to Mr. Bailey's office and requested that Mr. Bailey represent him.
- 4.) I have entered my appearance on behalf of plaintiff on April 30, 2001.
- 5.) Counsel is requesting a 60-day enlargement of time in the above captioned matter to allow counsel to thoroughly investigate and, to respond to the Defendants' Motion to Dismiss.

6.) Opposing counsel only concurs with a 30-day enlargement of time.

**WHEREFORE** counsel is requesting a 60-day enlargement of time and to advance the case management plan accordingly.

Respectfully Submitted,



Don Bailey ID# 23786  
4311 N. 6<sup>th</sup> Street  
Harrisburg, PA 17110  
(717) 221-9500

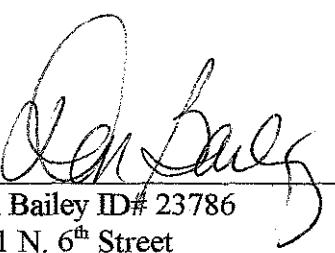
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THE MIDDLE DISTRICT OF PENNSYLVANIA**

**NATHAN CHARLES GRIGGS** )  
Plaintiff ) DOCKET 1:CV-00-2219  
v. )  
**JOHN D. PAYNE, et al.** )  
Defendants )

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th DAY OF APRIL 2001, a true and correct copy of the foregoing **ENTRY OF APPEARANCE** was served upon the following counsel of record by United States Mail, postage prepaid:

Frank Lavery Jr., Esquire  
301 Market Street  
Harrisburg, PA 17101

BY:   
Don Bailey ID# 23786  
4311 N. 6<sup>th</sup> Street  
Harrisburg, PA 17110  
(717) 221-9500